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August 20, 2021

VIA ECF

Hon. Sanket J. Bulsara
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

*Re: The Providence Groups, LLC v. Omni Administrators, Inc.
d/b/a Leading Edge Administrators (1:20-cv-05067 (FB) (SJB)*

Dear Magistrate Bulsara:

The Plaintiff and Defendant in the above matter are jointly requesting an extension of time to complete discovery in the above matter. Pursuant to the Discovery Plan Worksheet, all fact discovery in this matter is to be completed by September 1, 2021.

This matter has become far more complex than initially contemplated. The Defendant, Omni Administrators, Inc. d/b/a Leading Edge Administrators (“LEA”) was the third-party administrator of Plaintiff’s self-funded insurance plan. In that role, LEA had to process thousands of claims for medical services amounting to millions of dollars over the course of 21 months. As a result, the claims data and the records utilized to undertake this task are far more significant than initially anticipated. To make matters more difficult, Plaintiff, Providence, was comprised of a group of independent nursing homes, each owned and managed by a separate entity and each with its own claims data for its employees. The parties have worked together cooperatively in an effort to undertake discovery, but the matter has simply become more complex than either party anticipated when the case commenced.

Document discovery has been provided by both parties. However, on July 21 and 22, 2021, we conducted a two day in-person deposition of Avrumi Friedman from LEA. In light of information gathered in that deposition, we have requested, and LEA is in the process of gathering, additional documents relevant to the claims here. The discovery undertaken at the Friedman deposition also revealed that there are additional witnesses with potential relevant information that the parties need to interview and/or depose. Finally, as a result of the Friedman deposition, LEA has determined that it requires additional documents from Plaintiff. Finally, in light of recent evidence reviewed by the undersigned, Providence intends to file an amended Complaint by the end of next week.

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We write the Court to respectfully request an extension of time, until February 28, 2022 in order to conduct additional discovery.

Thank you in advance for your time and consideration of this request.

Very truly yours,

HOLIFIELD & JANICH, PLLC



By: _____

Al Holifield

Attorney for The Providence Groups, LLC